



14 March 2019
Norwalk Shellfish Commission
137 East Avenue
Norwalk, CT 06851

Michael Grzywinski
Connecticut Department of Energy and Environmental Protection
79 Elm Street
Hartford, CT 06106-5127

Re: Norwalk Shellfish Commission Consultation for Eversource Twin 115kV HDD Cables

Dear Mike,

After significant consideration, the Norwalk Shellfish Commission (NSC) is not yet in a position to offer a favorable consultation for the Eversource twin 115kV cable (now HDD) project under and across Norwalk Harbor as currently designed. Though the NSC is not opposed to crossing the harbor, involving natural shellfish beds identified in our jurisdiction since 1882, we aren't currently satisfied with the presentation, plans nor methods described. We feel the need for a more collegial, and perhaps DEEP-moderated, environment toward mutual goals, similar to what we are experiencing with our DOT Walk Bridge replacement colleagues. This is a summary of our concerns:

1. Eversource submitted to the NSC a demonstrably incomplete and misleading benthic macroinvertebrate survey (attached) prepared by the Kleinschmidt Group of Essex, Connecticut. Their grab sample summary (Table 1, page 10) didn't record a single bivalve mollusk. Though the survey work occurred in June, and did span a low tide for easy observation, the words oyster and *Crassostrea*, only appeared a total of six times. Though bivalves may have a patchy distribution, and may be missed in grab sample locations, in their summary oysters were only identified as attached to pilings. Additionally, the survey says, "Most of these bivalves were in poor condition (open shells without living organisms)." The NSC views this as a very serious, and perhaps disqualifying, flaw in their application. These data stand in strong contrast to easily observed oyster populations in the immediate HDD path:

(Intentionally left blank)



Living, comma-shaped oyster reef. North of Northernmost dock. Near immediate planned HDD path. February 2019.

Numerous living oysters beneath dock.

Live seed oysters growing within corrugated concrete launch ramp macadam. February 2019.

2. No reasonable alternative routes or methods have been presented for NSC consideration. In other public meetings, the only alternatives presented have been overhead lines to perhaps literally and figuratively hold over our heads a highly undesirable option. Our inquiry to clarify the reason for the no current alternative/100% design offer was that one would be forthcoming “only if required by the (Connecticut) Siting Council”. This was not our understanding of their requirements by the DEEP for their presentation to the NSC.
3. When asked about a route turn to the left/North on Water Street to cross via HDD North of the Stroffolino drawbridge, the limited space caused by buildings on the West side of North Water Street and the sheathing layout difficulties from the East bank were claimed to be prohibitive. We have learned from our utility consultant and the DOT that neither is prohibitive from an engineering perspective.
4. The NSC feels the 115kV cables’ crossing should be located between the Stroffolino and the new Walk Bridge. New bridge traction, signal and bridge power cables will be in this area, as well as the already well-known no anchorage SNET cable and water main areas.
5. The DOT currently plans to “cut and cover” within sheet piles to accomplish their cables’ crossing. This is a recent design proposal change due to the described high environmental risk of frack-out in their originally designed HDD path. As spilled HDD drilling mud is generally viewed as having low environmental impact, unless in large volume, this risk must therefore be viewed as exceptionally high due to the strata encountered. We’re not assured that at no place along the cross section of the deeper-diving HDD path proposed by Eversource, that similar local conditions yielding decreased drilling fluid pressure containment ability will not be present. NB, the DOT’s HDD planned method employed significant drill bore entry

sheathing and was still not viewed as an acceptable frack-out risk from an environmental perspective. Eversource has provided no documentary risk assessment, unlike as presented by the DOT.

6. Early in the process (Summer 2018) , Eversource claimed the inability to make 90⁰ bends in the landward part of the project, which would limit any significant deviation from the Eastward path along Elizabeth Street and across Water Street to the harbor. We know from our utility consultant and Eversource's own work in nearby Greenwich that this ability clearly exists.
7. Eversource indicated that a standard bond calculation per linear distance would be used. Any bond or letter of credit must take into account that >50% of all of Connecticut's shellfish harvest comes from Norwalk, >\$15 million/year. Cable relocation here is unlike anywhere else in the State, and few places in the Country.
8. To our knowledge, Eversource has not offered a written IR plan for the HDD proposal nor a complete disclosure of all drilling mud components planned.
9. Any completed HDD project as presented should require the local pilings to be load-tested.
10. HDD start/stop work notification copy lists have not been presented.
11. In the current design, if a piling is removed by ice, a vessel, or other means, what is the full process in this scenario to resume normal dock operation?
12. No formal plans have been submitted for drilling pit fluid level monitoring and the standby capacity for fluid/tidal/rainwater removal.
13. There is no known formal assurance that the City of Norwalk won't be restricted in facility modification along or near the proposed cable route.
14. As clearly evidenced by the City's waiver of launching fees during impending tropical storms, the launch ramps are an efficient vessel evacuation route. It seems particularly unwise to place a high voltage system with potentially vulnerable landward and waterward components near a means of egress. We feel the Department of Homeland Security/FEMA should be a party to this application and their findings communicated to the NSC.

Thanks in advance for your advice as we strive for an acceptable design and safeguards for the project. Signed hardcopy to follow.

Respectfully submitted,

Pete Johnson, NSC Chair

Steve Bartush, NSC Commissioner

cc: Ian Cole, Eversource
John Pinto, NHMC-ARC Chair
John Romano, NHMC Chair
Coral E. Siligato, PE, Project Manager, US Army Corps of Engineers
Geoff Steadman, NHMC Consultant

